

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PETER KEENAN,	:	
Plaintiff	:	
v.	:	Civil Action No.: 02-CV-4420
UNUM PROVIDENT CORPORATION	:	
Successor-In-Interest to PAUL REVERE	:	
LIFE INSURANCE COMPANY and	:	
JOSEPH P. REILLY INSURANCE AGENCY	:	
Defendants	:	

**PLAINTIFF'S REPLY TO NEW MATTER OF  
DEFENDANT, JOSEPH P. REILLY INSURANCE AGENCY**

Peter Keenan (“KEENAN”) by his attorney, Jonathan Wheeler, P.C., files this Reply to New Matter of Defendant, Joseph P. Reilly Insurance Agency (“REILLY”), as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted. However, Reilly received commissions from the premiums paid to Paul Revere.
5. Denied. To the contrary, this action was commenced in a prompt and timely manner within the applicable period of limitations.
6. Admitted with the qualification that Paul Revere unilaterally terminated its payment of benefits under the policy.
7. Denied as stated. To the contrary, Paul Revere unilaterally terminated the payment of benefits to Keenan.

8. Admitted. However, Kennan paid premiums for the policy from which Reilly received commissions.

**WHEREFORE**, Kennan prays that judgment be entered in favor of Kennan.

LAW OFFICES OF JONATHAN WHEELER, P.C.

BY: /s/  
JONATHAN WHEELER, ESQUIRE  
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Attorney for Plaintiff, Peter Keenan

**V E R I F I C A T I O N**

I, Jonathan Wheeler, Esquire, hereby states that he is authorized to make this verification on behalf of plaintiff, Peter Keenan, and the facts set forth in the attached Reply to Defendant's New Matter are true and correct to the best of his knowledge, information and belief and that this verification is made subject to the penalties of 18 PA. C.S. §4904 relating to unsworn falsification to authorities.

/s/  
JONATHAN WHEELER